

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ANGELITA SANDERS,

Plaintiff,

v.

J.C. PENNEY CORPORATION, INC.,

Defendant

Civil Action

File No.: 1:11-CV-02759-JOF

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**J.C. PENNEY CORPORATION, INC.’S MOTION FOR SUMMARY  
JUDGMENT**

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COMES NOW Defendant, J.C. Penney Corporation, Inc. (“JCP”), by and through the undersigned counsel of record, and pursuant to Federal Rule of Civil Procedure 56, file this motion for partial or total summary judgment.

A memorandum of law in support of JCP’s Motion for Summary Judgment with accompanying exhibits, as well as a Concise Statement of Material Facts to Which No Genuine Issue Exists to be Tried and a Theories of Recovery are filed contemporaneously herewith.

***[SIGNATURE ON FOLLOWING PAGE]***

This 6th day of February, 2012.

Goodman McGuffey Lindsey & Johnson, LLP  
Attorneys for J.C. Penney Corporation, Inc.

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**CERTIFICATE OF COMPLIANCE**

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The foregoing document is double spaced in 14 point Times New Roman font and complies with the type-volume limitation set forth in Local Rule 7.1.

*S/JAMES T. HANKINS, III*

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**CERTIFICATE OF SERVICE**

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This is to certify that I electronically filed this J.C. PENNEY CORPORATION, INC.'S MOTION FOR SUMMARY JUDGMENT with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Brent J. Savage, Esq.  
Brent Jamieson Savage, Jr., Esq.  
Savage, Turner, Kraueter, Pinckney & Madison  
P.O. Box 10600  
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This 6th day of February, 2012.

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